

# **Plaintiffs' Exhibit 47**

STRICTLY CONFIDENTIAL CONTAINS BUSINESS SECRETS

**Responses to Questions 1, 4-25, 28-36, and 39-52 of the Autorité de la  
Concurrence's Request for Information dated 23 July 2019 Case No. 19/0030F**

This submission sets out Google's response to questions 1, 4-25, 28-36, and 39-52 of the Autorité de la Concurrence's (**FCA**) Request for Information relating to the online advertising sector dated 23 July 2019 (**RFI**). The RFI requires Google to provide the responses to these questions by 23 September 2019. Responses to the remaining questions will be provided shortly.

As agreed with the Rapporteur, Mr Clément Chazelas, by email dated 11 September 2019, a French version of Google's response will follow by the end of the week commencing 23 September 2019.

Google's response and its annexes contain sensitive business secrets that should not be disclosed to third parties. Pursuant to Article R463-13 of the Code de Commerce, Google will formulate a request for this purpose and provide a non-confidential version of its responses.

Google does not endorse or validate the content, findings or views expressed in any third party materials, reports or studies referred to in this response.

We hope our responses are helpful. Please let us know if you have any questions.

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### Definitions

**Ad network** – a platform that brokers the sale of publishers' ad inventory to advertisers.

**Authenticated users** – users that have created and are signed-in to a Google Account when they interact with Google services.

**Advertising intermediation** – the resale of digital advertising from publishers or the provision of services that facilitate the sale of digital advertising between advertisers and publishers.

**CPM - (Cost per impression)** – the cost to the advertiser of every 1,000 impressions of an ad.

**Digital advertising** – the purchase, sale and serving of advertising either a) displayed on an Internet page viewed through a web browser or b) accessed via an app downloaded onto a device.

**Display advertising** – any digital advertising which isn't search advertising (includes both video and non-video advertising content sold either inside standard display units, integrated into the surrounding content or shown during, before or after other video content).

**Dynamic allocation** – a feature within Ad Manager that allows a publisher to maximise its overall yield by ensuring there is competition for its inventory from multiple demand sources, while also protecting the value of guaranteed inventory/reservations.

**Exchange bidding** – a service offered by Google Ad Manager; this is a server-side unified auction where several Ad Exchanges and supply-side platforms can compete in real time along with Google's Ad Exchange (AdX) to purchase ad impressions.

**Google** – means Alphabet Inc and all of the subsidiaries and businesses within the Alphabet group.

**Header bidding** – an advanced programmatic advertising technique wherein publishers offer inventory to multiple ad exchanges and supply side platforms simultaneously before making calls to their ad servers.

**Inventory** – the number of advertisements or amount of ad space a publisher has available for sale to advertisers.

**Online search services** – user services related to the use of a search engine, including both general search services and specialised search services.

**Privacy policy** (also known as Privacy Notice or Data Use policy) – policy relating to the collection, use, processing, sharing (internally and externally with third parties) and retention/storage of user data by a provider of User Services.

**Publisher** – producer of online content that may be used to support the display of advertising to consumers.

**Search advertising** – advertising related to online search services i.e. where advertisers pay to list and/or link their company site domain name to a specific search word or phrase (includes advertising relating to general search, specialised search and mapping services).

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**Unauthenticated users** – users that are not signed-in when they interact with Google services, or who use Google services without a Google Account.

**User services** – the provision of online products or services to consumers, either wholly or partially funded by, or otherwise used to support, the display of advertising to consumers.

51. With the introduction of Header Bidding, third-party demand sources were able to <sup>22</sup> compete dynamically in the Ad Manager (then DFP) auction. No changes needed to be made to the Ad Manager auction to facilitate Header Bidding.

52. Following the introduction of Header Bidding, Google optimised its publisher focused tools, including by introducing Exchange Bidding and Enhanced Dynamic Allocation (see the response to question 8). Exchange Bidding enables third party ad exchanges and SSPs to compete with line items booked in Ad Manager and with AdX directly within Ad Manager.

**Q15. Please indicate whether any third-party ad servers are, or have been, able to interact with AdX in real time under the same conditions as those offered by DFP's dynamic allocation function. If so, please list them. If applicable, please identify your response during the targeted period.**

53. Any third party ad server can be used in combination with AdX, but Dynamic Allocation is a technical feature of Ad Manager's ad serving function.

54. AdX operates in combination with third party ad servers through Google Publisher Tag (**GPT**) passbacks and AdX direct tags. The third party ad server can make a call to AdX, using a GPT passback or AdX direct tag, to serve an ad matching specified targeting criteria. The Ad Manager ad server will then return an ad that matches the specified targeting criteria.

55. AdX is an ad exchange, and does not directly bid into auctions run by third party ad servers. A publisher using a third party ad server would have to assign a static CPM price or serving priority to the AdX demand. The third party ad server can then integrate that demand dynamically in to their creative selection decisions. That said, most demand sources (ad networks, ad exchanges and demand-side platforms) that submit real-time bids on AdX, also submit real-time bids on third-party SSPs. As set out in response to question 16 below, some third party ad servers have features equivalent to Dynamic Allocation that they offer their publishers to maximise revenue yield.

**Q16. Please identify the ad servers and the intermediation services of the DFP and AdX competitors who have implemented a technology similar to dynamic allocation during the targeted period.**

56. A number of competing ad servers and advertising intermediation services have introduced new technologies similar to Dynamic Allocation. These include, amongst others: